

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

GE HEALTHCARE BIO-SCIENCES AB, )  
GE HEALTHCARE BIO-SCIENCES )  
CORPORATION, and GENERAL )  
ELECTRIC COMPANY, ) C.A. No. 18-1899-CFC  
Plaintiffs, )  
v. )  
BIO-RAD LABORATORIES, INC., )  
Defendant. )

**DECLARATION OF ANDREW E. NARAVAGE  
IN SUPPORT OF BIO-RAD LABORATORIES, INC.'S  
MOTION TO TRANSFER PURSUANT TO 28 U.S.C. § 1404(a)**

I, Andrew E. Naravage, declare:

1. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendant Bio-Rad Laboratories, Inc. (“Bio-Rad”) in the above-captioned case. I am an attorney in good standing licensed to practice in California. I submit this declaration in support of Bio-Rad’s Motion to Transfer, filed concurrently herewith. I am personally familiar with the facts stated herein and, if called as a witness, could testify competently hereto.

2. Attached as **Exhibit A** is a true and correct copy of Plaintiffs GE Healthcare Bio-Sciences AB’s, GE Healthcare Bio-Sciences Corporation’s, and General Electric Company’s (collectively, “GE”) Notice of Deposition of Shawn Anderson in *GE Healthcare Bio-Sciences AB v. Bio-Rad Labs., Inc.*, No. 2:14-CV-07080-LTS-SN, currently pending before the United States District Court for the Southern District of New York.

3. Attached as **Exhibit B** is a true and correct copy of GE’s Notice of Deposition of Richard Lee in *GE Healthcare Bio-Sciences AB v. Bio-Rad Labs., Inc.*, No. 2:14-CV-07080-

LTS-SN, currently pending before the United States District Court for the Southern District of New York.

4. Attached as **Exhibit C** is a true and correct copy of GE's Notice of Deposition of Farah Mavandadi in *GE Healthcare Bio-Sciences AB v. Bio-Rad Labs., Inc.*, No. 2:14-CV-07080-LTS-SN, currently pending before the United States District Court for the Southern District of New York.

5. Attached as **Exhibit D** is a true and correct copy of a printout of Shawn Anderson's LinkedIn profile, located at the URL <https://www.linkedin.com/in/shawnmarkanderson>.

6. Attached as **Exhibit E** is a true and correct copy of a printout of Richard Lee's LinkedIn profile, located at the URL <https://www.linkedin.com/in/richard-lee-752aaa2>.

7. Attached as **Exhibit F** is a true and correct copy of a printout of Farah Mavandadi's LinkedIn profile, located at the URL <https://www.linkedin.com/in/mavandadi>.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 30, 2019 in San Francisco, California.

/s/ Andrew E. Naravage

Andrew E. Naravage  
Quinn Emanuel Urquhart & Sullivan, LLP  
50 California Street, 22<sup>nd</sup> Floor  
San Francisco, CA 94111  
Tel: (415) 875-6600